

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation

This Document Relates To  
*Orange County Water District v. Unocal  
Corp., et al.*

MDL NO. 1358 (SAS)  
Master File C.A. No. 1:00-1898

**DECLARATION OF ERIK ALSON IN  
SUPPORT OF BP DEFENDANTS'  
MOTION FOR SUMMARY  
JUDGMENT**

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1. My name is Erik Alson. I am over eighteen years of age, and I am competent to submit this declaration. If called as a witness, I could testify to the following facts based on my own first-hand knowledge.

2. I was first employed by Atlantic Richfield Company and/or its successors in 1990. Beginning in May 2004, I was the Volume Planning Manager for the petroleum refinery located in Carson, California ("Carson Refinery") owned by BP West Coast Products LLC ("BP"). As Volume Planning Manager I supervised the group responsible for establishing near-term operational strategies at the Carson Refinery. My responsibilities included, among other things, assessing crude and feedstock supplies, and reviewing market conditions to determine appropriate product mixes. Before holding this position, I was the Operations Superintendent for Process Services from October 2000 through April 2004. As Operations Superintendent I oversaw the Storage and Handling Operations Group, and my responsibilities included, among other things, management of the petroleum product tank, pipeline, blending, and shipping activities of Atlantic Richfield Company and BP at the Carson Refinery.

3. The Carson Refinery is the only refinery owned or operated by Atlantic Richfield Company or BP that sold or otherwise supplied gasoline oxygenated with MTBE to service stations within the Orange County Water District service area. On December 31, 2002, BP began to produce gasoline at the Carson Refinery that met the MTBE prohibitions set forth in California Code of Regulations, title 13, section 2262.6, which became effective on December 31, 2003. On January 17, 2003 BP made its last sale or shipment from the Carson Refinery of gasoline with MTBE concentrations above the levels set forth in California Code of Regulations, title 13, section 2262.

4. It was not necessary for me to consult any documents or electronic databases in order to provide this information through my declaration.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on February 4, 2013 at Carson, California.

  
ERIK ALSON